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August 5, 2016

VIA ECF

Hon. Joseph F. Bianco  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

**Re: *Ruggiero v. County of Suffolk, 14-cv-7434 (JFB)(GB)*  
*Our File No. 14-0053***

Dear Judge Bianco:

I represent the Plaintiff in the above referenced matter.

This matter is one in a series of cases brought against Suffolk County on behalf of 9-1-1 Operators and Public Safety Dispatchers alleging violations of the FMLA and ADA.

One of the cases *Castaneda v. Suffolk County et al 15-cv-00185 ADS-SIL* is pending before Judge Spatt.

Three additional cases have not cleared the administrative hurdles to filing suit. On February 19, 2016, the EEOC found probable cause to believe that the County of Suffolk discriminated against three other 9-1-1 Operators and Public Safety Dispatchers – Joseph Montaldo (EEOC Charge No. 520-2014-03158), Christy Pflug (EEOC Charge No. 520-2014-01814), and Anne DiIorio (EEOC Charge No. 520-2014-00200). These cases were referred to the U.S. Department of Justice on May 9, 2016. *See Exhibit A*. As of the date of this application, the DOJ has not made a determination as to whether it will be prosecuting these cases.

Plaintiff respectfully requests a Stay of Discovery pending a decision from the Department of Justice as to whether they will be prosecuting cases on behalf of Joseph Montaldo, Christy Pflug, Anne DiIorio, or any other call center operators.

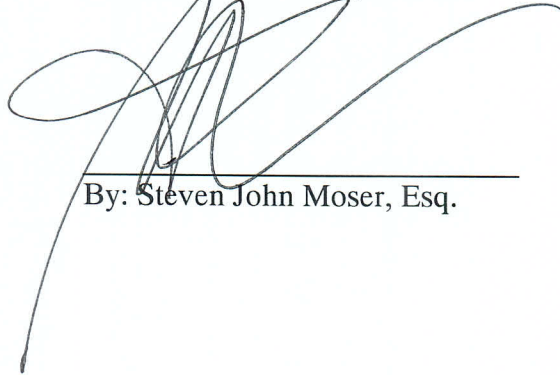
Joint discovery will result in vast economies of both judicial and client resources.

The County consents to this application, but reserves its right to oppose any motion for a joint trial.

I thank the Court for its consideration.

CC: Megan O'Donnell (*Via ECF*)

Respectfully submitted,  
STEVEN J. MOSER, P.C.

A handwritten signature in black ink, appearing to read 'Steven J. Moser', is written over a horizontal line. The signature is stylized with loops and a long horizontal stroke extending to the right.

By: Steven John Moser, Esq.